

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION**

UNITED STATES OF AMERICA
THE STATE OF WISCONSIN

Plaintiffs

v.

Civil Action No. 10-C-910

NCR CORPORATION
APPLETON PAPERS INC.
BROWN COUNTY
CITY OF APPLETON
CITY OF GREEN BAY
CBC COATING, INC.
GEORGIA-PACIFIC CONSUMER PRODUCTS LP
KIMBERLY-CLARK CORPORATION
MENASHA CORP.
NEENAH-MENASHA SEWERAGE COMMISSION
NEWPAGE WISCONSIN SYSTEMS, INC.
P.H. GLATFELTER CO.
U.S. PAPER MILLS CORP.
WTM I COMPANY

Defendants

NOTICE OF BANKRUPTCY AND AUTOMATIC STAY

PLEASE TAKE NOTICE that, on September 7, 2011 (the “Commencement Date”), NewPage Wisconsin Systems, Inc., (the “Defendant”) commenced a case under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). The Chapter 11 case of the Defendant is being jointly administered under case no. 11-12804 (KG). A copy of the Defendant’s Chapter 11 petition is attached hereto as Exhibit A.

PLEASE BE ADVISED that, as of the Commencement Date, any new or further action against the Defendant is stayed pursuant to section 362 of the Bankruptcy Code (the “Automatic Stay”) and the *Order Enforcing Sections 362 and 525 of the Bankruptcy Code* [Docket No. 5], attached as Exhibit B hereto. Section 362 of the Bankruptcy Code provides, in relevant part, that the filing of the petition operates as a stay, applicable to all entities, of, among other things, “the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title . . .” and of “any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate.” 11 U.S.C. §§ 362(a)(1) & 362(a)(3). Under 11 U.S.C. § 541(a)(1), the property of the estate consists of, among other things, “all legal or equitable interests of the debtor in property as of the commencement of the case.” This includes all property of Defendant that is the object of the Parties’ claims asserted against Defendant in the above captioned lawsuit.*

Respectfully submitted this 15th day of September, 2011

NEWPAGE WISCONSIN SYSTEMS INC.

By: /s/ Daniel C. Murray

Daniel C. Murray
JOHNSON & BELL, LTD.
33 West Monroe St. Suite 2700
Chicago, Illinois 60603-5404

Tel. 312 984 0226
murrayd@jbltd.com

* Defendant NewPage Wisconsin Systems, Inc. is also a Defendant in the case Appleton Papers Inc., et al. v. George A. Whiting Paper Co., et al. No. 08-C-16 pending in this Court. While that case is ongoing for other Parties, Defendant NewPage on March 31, 2010 was dismissed from that lawsuit with prejudice. Doc. 856. No Party has indicated any interest in pursuing NewPage further in that lawsuit, and any Party attempting to do so now would be precluded by the Automatic Stay Order.

Certificate of Service

I hereby certify that on September 15, 2011 I electronically filed the attached *Notice of Bankruptcy and Motion for Stay* with the Clerk of the Court using the CM/ECF system, thereby sending notification of such filing to all Registered Users.

/s/ Letitia M. Reyes

JOHNSON & BELL, LTD.
Suite 2700
33 West Monroe Street
Chicago, IL 60603-5404

2822946